

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: : Chapter 13
 : NO. 17-13760-MDC
Lisa Rose Mariani, :
 : MOTION TO MODIFY PLAN
 : as per 11 USC 1329(d)(1)(A)

NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE

The Debtor has filed a Motion to Modify Confirmed Chapter 13 Plan. Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the Court to grant the relief sought in the Motion or if you want the Court to consider your views on the Motion, then **on or before** **August 25, 2022, you or your attorney must do all of the following:**

(a.) File an answer explaining your position at:

Clerk, U.S. Bankruptcy Court, Eastern District of Pennsylvania
Robert N. C. Nix Sr. Federal Courthouse
900 Market Street
Philadelphia, PA 19107

(b.) Mail a copy to the Movant:

Paul A. R. Stewart, Esquire
Helm Legal Services LLC
333 E. Lancaster Avenue, Suite 140
Wynnewood, PA 19096

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the Court may enter an Order granting the relief requested in the motion.

3. **A hearing on the Motion is scheduled to be held before the Honorable Magdalene D. Coleman on Thursday, September 1, 2022 at 11:00 am at the Robert N.C. Nix Sr. Federal Courthouse, Courtroom #2, 900 Market Street, Philadelphia, PA 19107.**

Dated: August 2, 2022

/s/ Paul A. R. Stewart

Paul A. R. Stewart, Esquire

Legal Helm LLC

333 E. Lancaster Ave, Suite 140

Wynnewood, PA 19096

610-864-5600

Attorney for Debtor

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CERTIFICATE OF SERVICE

I, Paul A. R. Stewart, Esquire, hereby certify that on August 2, 2022, I served via first class regular mail and/or electronic filing, with a true and correct copy of the Notice of Debtor's Motion to Modify Confirmed Chapter 13 Plan upon:

Jill Manuel-Coughlin, Esquire
Powers Kirn, LLC
8 Neshaminy Interplex, Suite 215
Trevose, PA 19053
jill@powerskirn.com

United States Trustee
833 Chestnut Street, Suite 500
Philadelphia, PA 19107

Kenneth E. West (Trustee)
1234 MARKET STREET, SUITE 1813
PHILADELPHIA, PA 19107

/s/ Paul A.R. Stewart

Paul A.R. Stewart, Esquire
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333 E. Lancaster Ave, Suite 140
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pstewart@legalhelm.com
Attorney for Debtor